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Sent: Monday, August 05, 2013 4:30 PM

To: OHV, OHVINFO@Parks

Subject: Comments on Proposed Rulemaking - OHMVR

Dear OHMVR,

Kindly consider our comments below on your proposal to revise the Grants & Cooperative Agreements Program regulations.

First, we support the proposed changes in their entirety. We agree with a minimum funding level for Development Projects, and a required warranty for OHV use. We also agree with the proposed revisions to documents, including those to the evaluation criteria and questions. Specifically, we wish to commend staff for proposing to simplify the evaluation criteria regarding public notice and stakeholder input.

Regarding evaluation criteria #8 for Education and Safety Projects, we suggest adding "Mobile Devices/GPS Unites" to the list of methods of education. These devices are not connected to the internet when performing their function so they should not be classified as "Internet Classes." We do understand that "Other" is an available response that could accommodate this method but such digital navigation tools continue to grow in use by leaps and bounds. Additionally, we suggest modifying the response of "Audio programs" to "Audio/Video programs" to accommodate like media.

However, requesting "detailed explanations" requires sufficient space within OLGA's data entry fields. We've tried to detail our multiple methods but find our responses are allowed only a few hundred characters before being truncated. Because there is no character limit indicated we've had to test each field with dummy data to assess how many characters are allowed before crafting our response. These low character limits stress us to create abbreviations, omit pronouns and overly simplify our answers. This makes it difficult to adequately describe and support our responses to these important evaluation criteria. Please revisit OLGA's character limits for the explanation fields and consider increasing them to allow sufficient space to provide the detailed explanations that are requested by each item.

Finally, we wish to reemphasize the need for the Grants & Cooperative Agreements Program to adequately fund the areas that are providing the most OHV opportunity. Too often large awards go to applicants with little to no OHV opportunity in their jurisdictions. This is especially important for law enforcement grants as managing OHV recreation requires a mix of providing a carrot (opportunity) and a stick (enforcement).

Thank you for your kind consideration of our comments.

Randy Banis

On behalf of Friends of Jawbone, Ed Waldheim, president